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TECHNOLOGIES L.L.C.

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March 5, 2001

Gary Lenz
PA DEP, Bureau of Air Quality
909 Elmerton Avenue
Harrisburg, PA 17110-8200

Dear Mr. Lenz:

Attached are the two revised pages of our permit (36-03033) application requested in the remarks of the 02/02/01 RFD response from you for our first floor circuit board assembly area. Please call me if you have any questions or need anything else. Thank you for your timely response to the RFD.

Sincerely,

A handwritten signature in cursive script that reads 'Robin E. Thomas'.

Robin E. Thomas
Director, Environmental & Chemical Services

[illegible]

Please read instructions carefully before completing this application.

Page 12 of 13

Section 3: Source Information

Complete this section for each source at this site.

3.1 General Source Information

a) Unit ID Number: BA-9 b) Company Designation: Soldering Operations

c) Source Type (check one): ☐ Combustion ☐ Incinerator ☒ Process

d) Plan Approval or Operating Permit Number: N/A

e) Manufacturer: various f) Model Number: various

g) Unit Description: 1st & 2nd floor clean rooms' soldering and assembly line hand solder stations *

h) Rated Heat Input/Thruput: N/A i) Installation Date: 2nd Fl. October 1981

j) Type of Fuel: N/A k) Annual Fuel Usage: 1st Fl. April 2001 *

l) Sulfur Content of Fuel (%): N/A

Incinerators: Complete the following additional information

a) Incinerator Capacity: N/A Lbs/Hr b) Waste Type:

c) Primary Burner Heat Input: Units:

d) Secondary Burner Heat Input: Units:

e) Incinerator Class:

3.2 Actual Emission Estimates:

Pollutants	Quantity (lb/hr)	Quantity (tons per year)
possibly some trace amounts of lead	< 0.048 *	< 0.050 *



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January 23, 2001

Gary Lenz
PA DEP, Bureau of Air Quality
909 Elmerton Avenue
Harrisburg, PA 17110-8200

Dear Mr. Lenz:

Attached is a Request for Determination that you asked for during our telephone conversation, yesterday. The application is being made for review of an additional electronic circuit board assembly area that is planned for the first floor of our facility. The new area will be very similar to an existing assembly area on our second floor.

The planned assembly area will be part of our Unit ID Number BA-9 (Soldering Operations) (on our 10/31/97 facility permit application), as is the second floor clean room assembly area. The new area will produce very few actual emissions. As a precaution, all air exhausted from the soldering operations will be treated by our air scrubber system. The scrubber has significant reserve capacity, easily capable of handling this new area.

We would like to have this new area installed and operational by April of this year. Please, call me if you have any questions.

Sincerely,

Robin E. Thomas
Director, Environmental & Chemical Services

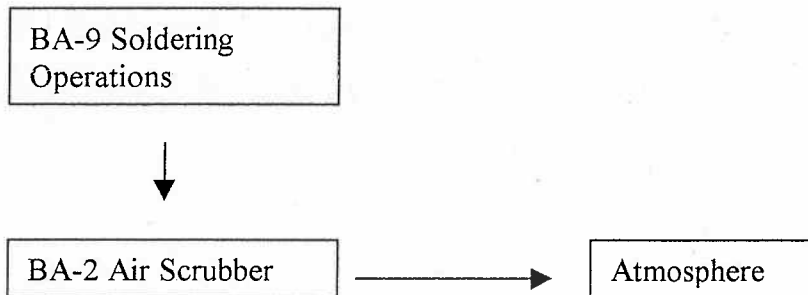
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B. This source will be very similar to the clean room presently on our second floor. It will be installed on our first floor to increase overall manufacturing capacity.

The area will be used for circuit board assembly production, and will be included in the BA-9 Unit ID Number for our sources (Soldering Operations). Processes performed in the area will include wave solder, surface mount re-flow ovens, and hand soldering assembly lines. All exhaust from soldering operations will be tied into the air scrubber, which has plenty of reserve capacity.

The air emissions from soldering processes are very low. An estimate of 50 pounds per year of pollutants is used for the emission calculations in this area. This figure is conservatively on the high side.

Schematic Flow Diagram:



L. Calculations

Total emissions < 50 pounds/year

$(< 50 \text{ Pounds/year}) / 260 \text{ work days/year} = (< 0.192 \text{ pounds/day})$

$(< 0.192 \text{ pounds/day}) / 8 \text{ hours/work day} = (< 0.024 \text{ pounds/hour})$



L. Estimated Emissions (Attach calculations and basis for estimated emissions):

Pollutant(s)	Emissions (lbs/hr)	Emissions (tons/year)
possibly some trace amounts of lead	<0.024	<0.025

M. List all source(s) which are operating without permit(s) within last five years. This listing should include sources that were exempted under a Request for Determination for Plan Approval/Operating Permit (RFD).

Source	Date Installed	Department Determination, if any
N/A		

N. Will the construction or modification of the source covered under this RFD increase emissions from other sources at the facility? ☐ Yes ☒ No

If yes, describe and quantify emission increases on separate sheet(s).

OFFICIAL USE ONLY

Date Received: 1/24/01

Reviewed By: Gary Lentz

- ☒ A plan approval is not required for this source. (See 25 Pa. Code § 127.14(a)(1)-(9)).
☒ An operating permit is not required for this source. (See 25 Pa. Code § 127.443 (a)).
☐ The source(s) do(es) not qualify for exemption. Applicant is required to submit a plan approval and/or operating permit application.

Ronald Davis

Signature

2/2/01

Date

Ronald Davis, Chief NSR Section

Name and Title

Remarks:

Facility permit application must be updated to reflect this approval.



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY**

**Request for Determination of Requirement for Plan Approval/Operating Permit (RFD)
(Submit in Triplicate)**

A. Application is being made for: *[please mark the appropriate case(s)]*

☒ Exemption from Plan Approval

☐ Exemption from Operating Permit

Physical Changes of Minor Significance

☐ Changes Do Not Add New Equipment (See 25 Pa. Code § 127.14(c)(1)). Physical changes of minor significance must not violate the terms of an operating permit, the Pennsylvania Air Pollution Control Act (APCA), the Clean Air Act or regulations adopted thereunder. In addition, these changes can not result in emission increases above the emissions allowable in the operating permit or result in an increased ambient air quality impact for an air contaminant. Changes may be made within seven (7) days after the Department's receipt of a written request unless the Department requests additional information or objects to the changes.

☒ Changes Add New Equipment (See 25 Pa. Code § 127.14(c)(2)). Physical changes of minor significance must not violate the terms of an operating permit, the APCA, the Clean Air Act or regulations thereunder. In addition, these changes, which add new equipment, can not result in emission increases above the emissions allowable in the operating permit or result in an increased ambient air quality impact for an air contaminant. Changes can be made within 15 days after the Department's receipt of a written request unless the Department requests additional information or objects to the changes.

B. Narrative Source Description (Include: process description, control device, exhaust volume, stack data, schematic flow diagram, material data safety sheet and any other pertinent information - attach additional sheets as needed):

See Page 3.

C. Facility Name Bulova Technologies L.L.C.

Plant Name: Bulova Technologies L.L.C.

D. Mailing Address: 101 North Queen Street, Lancaster, PA 17604

E. Contact Person: Robin E. Thomas

Title: Director, Environmental Services

F. Telephone Number: (717) 299-2581, ext. 2607

G. Federal ID # 23-2793455

H. Current Operating Permit No., if any: 36-03033

I. Date of Installation: 02/01-03/15/2001

J. Location of Source(s): First floor clean room soldering and assembly line hand solder stations.

K. Municipality/Township: City of Lancaster

County Lancaster

I, Robin E. Thomas, certify under penalty of law as provided in 18 Pa. C. S.A. § 4904 and 35 P.S. § 4009(b)(2), that based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate and complete.

(Signed) Robin E. Thomas

Date: 01/23/2001

Name (typed) Robin E. Thomas

Title: Director, Environmental Services

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